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April 27, 2006

Honorable Raymond J. Dearie  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

**FILED**

IN CLERK'S OFFICE

U.S. DISTRICT COURT, E.D.N.Y.

★ MAY 15 2006 ★

**BROOKLYN OFFICE**

U.S.A. vs. Thelma Vincente Pina  
CR-03-0192(RJD)

Dear Judge Dearie:

This letter is to request a modification of the home confinement conditions previously imposed by the court in regards to Thelma Vincente Pina. As the Court may well remember, Your Honor released Ms. Pina from being confined at the Metropolitan Detention Center and allowed her to remain at her home under certain restrictions. Ms. Pina has been required to wear an ankle bracelet and has not been allowed to leave her home unless she had received permission from Pre-Trial Services.

The Court imposed these restrictions well over a year ago and Ms. Pina has complied with everything asked of her by Pre-Trial. She has requested that the Court relieve her of the obligation of staying at home.

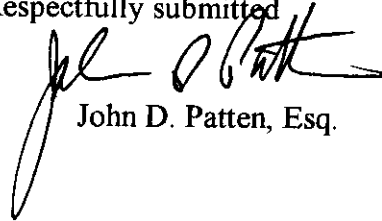
I have discussed this request at great length with AUSA Scott Klugman who has no objection to removing the home restriction. Mr. Klugman has advised that there are two individuals still to be extradited to the United States from Spain and that there has been no projected time when this would take place. The case against Ms. Pina dates back to January 2003 and Ms. Pina's status remains uncertain until the case comes to termination. Ms. Pina has complied with every demand made of her in this matter.

Should the Court grant this application, Mr. Klugman has requested that Ms. Pina remain within the New York City area and that she report by telephone once per week to Pre-Trial Services,

5/15/06  
Approved Counsel  
to notify Pretrial  
Defendant to remain in NYC  
& report to Pretrial by phone  
weekly.  
s/Raymond Dearie 11519

Wherefore, the defendant respectfully requests that the Court relieve her of the obligation of being confined to her home and set such other conditions that the Court may deem just and proper.

Respectfully submitted

A handwritten signature in black ink, appearing to read "John D. Patten", written over the typed name.

John D. Patten, Esq.

cc: AUSA Scott Klugman  
Mr. Michael Alerio – Pre-Trial Services

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